

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

DAKOTA COMPTON

*Plaintiff,*

vs.

STATE OF MARYLAND, *et al.*

*Defendants.*

Case No.:

**NOTICE OF REMOVAL**

The State of Maryland and the Maryland Transportation Authority ("State Defendants") give notice of the removal of this action from the Circuit Court for Baltimore City, Maryland, pursuant to 28 U.S.C. §§ 1441 and 1446, and state as follows:

1. Defendants have been sued in a civil action filed and presently pending before the Circuit Court for Baltimore City, entitled **Dakota Compton v. State of Maryland, et al.**, Case Number 24-C-18-006656.
2. On February 14, 2019, the State Defendants received a copy of the Writ of Summons and Complaint, which is the initial pleading setting forth the claims upon which this action is based. This Notice is therefore timely filed.
3. Upon information and belief, pursuant to the Maryland Judiciary Electronic Case Search docket, no other co-defendants have been served, and that on further information and belief, Co-defendant Satish Bhardwaj would consent to removal.

4. The following constitute all of the process, pleadings, and orders in this matter received by the State Defendants to date:
  - a. Summons for the State Defendants, a copy of which is attached as Exhibit A;
  - b. Complaint, a copy of which is attached as Exhibit B.
5. This action is a civil action of which this Court has jurisdiction, pursuant to 28 U.S.C. §§ 1331 and 1441, in that:
  - a. This action arises under the laws of the United States,
  - b. The six count Complaint alleges causes of action arising under Title VII of the Civil Rights Act of 1964, as amended 42 U.S.C. § 2000e, *et seq.*
6. State Defendants will promptly file a copy of this Notice with the Clerk of the Circuit Court for Baltimore City.

WHEREFORE, State Defendants respectfully request that this case proceed before this Court as an action properly removed.

Respectfully submitted,

/s/ Megan E. Mohan  
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Attorney for State Defendants

Date: March 15, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that on the 15th day of March 2019, a copy of the State of Maryland and that Maryland Transportation Authority's Notice of Removal, with exhibits, were mailed first-class mail, postage prepaid, to:

Mark R. Millstein, Esq.  
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*Co-Defendant*

s/Megan E. Mohan  
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Assistant Attorney General